



# California Regional Water Quality Control Board North Coast Region

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Secretary for  
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**Arnold  
Schwarzenegger**  
Governor

July 14, 2006

Ms. Candace Horsley, City Manager  
City of Ukiah  
300 Seminary Avenue  
Ukiah, CA 95482-5400

Dear Ms. Horsley:

Subject: Response to Comments, Draft Order No. R1-2006-0049

File: City of Ukiah Wastewater Treatment Facility (WDID No. 1B84029OMEN)

Thank you for your comment letter dated May 19, 2006 regarding the April 20, 2006 version of draft Order No. R1-2006-0049 for the City of Ukiah Wastewater Treatment Facility (WWTF). The Order has been revised in response to several of your comments. A second public notice period begins on July 14, 2006 and ends on August 17, 2006 to allow comments on several significant changes that were made to the Order. These changes are highlighted in the current version of the proposed permit and include:

- 1) the addition of interim effluent limitations and a compliance schedule for nitrate. This change resulted in revisions to Order Sections IV.A.2.b and VI.C.7.a.(iii); Monitoring and Reporting Program section X.A.2; and Fact Sheet Sections IV.C.3.a.(iii), IV.E., and VII.B.7;
- 2) modifications to the Order's language pertaining to wastewater collection systems. This change resulted in revisions to Order section VI.C.5.a, Monitoring and Reporting Program section X.D.1.c.(v); and Fact Sheet section VII.B.5.a.; and
- 3) the addition of an annual biosolids monitoring requirement to section X.D.1.e of the Monitoring and Reporting Program (MRP).

The Order will be considered at the Regional Water Board's September 20, 2006 Board Meeting. A copy of the revised draft Order will be mailed to you under separate cover. The following responses are intended to address comments presented in your letter.

***California Environmental Protection Agency***

*Recycled Paper*

**Comment A:**

*Currently, the City operates its Wastewater Treatment Plant (WWTP) pursuant to waste discharge requirements adopted in September 1999 (Order No. 99-65). The draft of the new permit proposes a nitrate limit, which was not included in Order No. 99-65. As described in detail below [in this letter], the tremendous additional investment necessary to add treatment systems to meet the nitrate limit presents an unreasonable burden to the City, while the benefits that will be seen appear minimal. Therefore, we request that the Regional Water Board carefully examine its basis for the requirements and make the amendments as suggested below. The City requests that the Regional Water Board remove the nitrate limit from this Order. Alternatively, if the Regional Water Board imposes a nitrate discharge limit, the Order should include interim, performance based limits for Discharge Point 001. The hydrogeologic study, as required by the Order, needs to be completed before any limit is placed on discharge to Discharge Point 002. If any nitrate limit is imposed, under the Basin Plan, the Regional Water Board should provide a compliance schedule as described below. ....”*

**Response:**

Receiving waters for the City's discharge of treated wastewater are designated for use as domestic and municipal supply (MUN). For waters designated as MUN, the Basin Plan (Table 3-2) contains water quality objectives for inorganic chemicals, including nitrate. As a result of exceedances of the receiving water limitation of 10.0 mg/L nitrate, effluent limitations for nitrate have been established in the draft Order.

The City is correct in pointing out that nitrate effluent limitations are not necessary for discharges to the percolation ponds at this time. The nitrate effluent limitation for Discharge Point 002 has been removed. After the City completes its hydrogeologic study, the Regional Water Board will reevaluate the need for nitrate effluent limitations for Discharge Point 002.

At the City's request, interim nitrate effluent limitations and a schedule for complying with final nitrate effluent limitations has been added to the Order. Interim effluent limitations and a compliance schedule is allowed under the Basin Plan due to the Regional Water Board's new interpretation of the Basin Plan nitrate standard as an effluent limitation rather than a receiving water limitation. The compliance schedule is based on the June 26, 2006 Infeasibility Analysis for nitrate submitted by the City and provides for a five year time schedule to complete studies necessary to achieve compliance with final nitrate effluent limitations.

**Comment B:**

**Reopener Provisions.** *Section VI.C.1. of the Draft Permit at pages 16-17 provides that the Order may be reopened and modified in the event the Regional Board adopts more stringent water quality standards, or determines that the City's effluent has a reasonable potential to cause or contribute to adverse impacts on water quality. The City accepts these Reopener Provisions, but also believes that additional circumstances would warrant reopening the Order. The Order should be reopened and revised in the event the Regional Board adopts less stringent*

*water quality standards or determines that the City's effluent does not have a reasonable potential to cause or contribute to adverse impacts on water quality.*

**Response:**

The reopener language in Section VI.C.1 of the draft Order states that "... effluent limitations for toxic pollutants established by this Order may be revised to be consistent with [any future State Water Board order, court decision, or State or federal statute or regulation]." This language would allow the Regional Water Board to reopen the Order in the event that more or less stringent water quality standards are established in the future. Thus Regional Water Board staff does not believe it is necessary to revise the reopener language.

The Discharger also requests that the Regional Water Board reopen the Order in the event that it determines that the City's effluent does not have a reasonable potential to cause or contribute to adverse impacts on water quality. Priority pollutant effluent limitations for copper and dichlorobromomethane have been established in the Order due to the fact that reasonable potential was demonstrated by the Discharger's existing effluent data. In the event that monitoring data collected during the term of this Order demonstrates that effluent does not contain concentrations of copper and/or dichlorobromomethane at concentrations that exceed the lowest water quality objectives for these pollutants, the Regional Water Board would most likely consider reducing the monitoring frequency for the remaining term of the Order. The City could use the data collected during the term of this Order to request that effluent limitations be removed during the next permit renewal.

**Comment C:**

***Temperature.*** *The City requests that the Regional Water Board modify the temperature requirement on page 15 of the Draft Order to read "The discharge shall cause an increase of no more than 1 degree Fahrenheit in the receiving water."*

**Response:**

The language in Receiving Water Limitation V.A.10 of the draft permit is consistent with the Basin Plan. The Basin Plan allows for alteration of the natural receiving water temperature if the discharger demonstrates to the satisfaction of the Regional Water Board that such alteration in temperature does not adversely affect beneficial uses. The City has not provided documentation that would allow the Regional Water Board to consider giving this exception at this time. Therefore, the temperature receiving water limitation has not been modified in response to this request.

**Comment D:**

***Wastewater Collection Systems.*** *On pages 20 and 21, the Draft Order requires the City to develop and implement a Management, Operation and Maintenance Program for the wastewater collection system. The requirements of this program are very similar to the recently adopted Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. The City*

*requests that the recently adopted requirements and schedule be used in lieu of the requirements and schedule in the Draft Order.*

**Response:**

The draft Order has been revised to reflect that the Ukiah WWTF is required to comply with the terms of the State Water Resources Control Board Order No. 2006-0003-DWQ Statewide General Waste Discharge Requirements for Sanitary Sewer Systems for all portions of the collection system under the City's control. However, the draft Order retains requirements for the City to notify the Regional Water Board in the event of a sanitary sewer overflow and to report, on an annual basis, the City's activities within the collection system over the previous twelve months.

**Other Comments (Number 1-5, 8-15, 19, and 21 through 25):**

Numbered comments 1-5, 8-15, 19, and 21-25 on pages 5 through 7 of the letter identify many typographical and editorial errors, such as misspelled words, missing or added commas, the missing mass discharge calculation formula, mislabeled table, and miss-numbering of pages in the Fact Sheet.

**Response:**

Regional Water Board staff appreciate the City's efforts to identify these errors. The draft Order has been revised to correct these errors.

**Comment 6:**

*On Page 28, item VI.C.7.a.ii, Task No. 2, second paragraph, fourth line, add a comma between "copper" and "the"*

**Response:**

Regional Water Board staff agree that this paragraph needs to be revised. The paragraph has been revised to read as follows: "If this sampling effort is necessary, the Discharger shall submit, for Executive Officer approval, a plan to sample the collection system to identify potential sources of copper. If copper is detected in the collection system ~~the presence of copper~~ at levels that support the determination of reasonable potential, the Discharger shall develop a source identification plan that includes the review of service connections for possible sources of copper, influent sampling, and an outreach program for businesses associated with possible copper contamination. If required, the source identification plan should be submitted to the Executive Officer for approval by September 1, 2007."

In addition, Task 4 of the copper compliance schedule in section VI.C.7.a.(ii), has been revised to read as follows: "If the results of the collection system sampling, identified in Task 3, reveals sources of copper, prepare and submit a source control implementation plan, for Executive Officer approval, and upon approval, initiate implementation of a source control plan for copper."

**Comment 7:**

*On Page B-1, change the callout for the pipeline entering the plant from the west to “18” Influent” from “42” Influent”.*

**Response:**

The topographic map on page B-1 of the Order was submitted to the Regional Water Board with the error identified in the City’s comment. The City has submitted the corrected topographic map and the revised map is included in the revised draft Order.

**Comment 16:**

*On Page F-4, II A, second paragraph, change the second and third sentences of the paragraph to read as follows: “The WWTF serves a population of approximately 20,000. The City’s population is approximately 15,000 with approximately 25 percent of the City’s population being served by the UVSD. The UVSD also serves Mendocino College, El Dorado Estates, Vichy Springs and areas contiguous to the City of Ukiah.”*

**Response:**

The Fact Sheet has been revised as requested by the City.

**Comments 17 and 18:**

On Page F-6, II A, last paragraph, move the phrase “along with the installation of new blowers” on the sixth line to the eighth line flowing “solids contact tanks”.

**Response:**

The Fact Sheet has been revised as requested by the City.

**Comment 20:**

*On Page F-9, II E, third line, change “December 2008” to “June 2009”.*

**Response:**

The Fact Sheet has been revised as requested by the City.

**Comment 26:**

*Pages F-23 through F-26, these tables are difficult to read.*

**Response:**

Attachments F-1 and F-2 have been revised to improve the readability of the pages.

Regional Water Board staff made several additional minor revisions to the Order, MRP and Fact Sheet as follows:

1. Permit language requiring annual reports for sanitary sewer overflows and source control has been moved from Order section VI.C.5 to MRP section X.D. In addition, annual biosolids reporting requirements have been added to MRP section X.D.1.e.
2. Section IV.A.3 of the MRP. The annual priority pollutant sampling requirement has been changed from “grab” to “24-hour composite” with a footnote to indicate that grab samples are allowed for certain pollutants (volatiles, pollutants requiring ultra-clean sampling techniques, etc.).
3. Section X.B of the MRP has been revised to include new standard language regarding electronic data submittal. The table in this section has been modified to include revised dates that the monitoring periods begin on. These dates have been revised because the permit adoption date has changed.
4. Fact Sheet section II.C. The first note below the table summarizing existing monitoring requirements and data, has been changed to read “\* Coliform effluent limitation is a ~~monthly~~ weekly median”. This change was made to properly reflect that the coliform effluent specified in Order No. 99-65 is a weekly median, not a monthly median. The number of weekly violations noted in the body of the table has been changed from 8 to 18. This number was determined based on a review of Ukiah’s monitoring data for the period of January 2000 to December 2005.
5. Fact Sheet section III.E.4 has been modified to provide additional justification for the hydrogeologic study requirement.

Regional Water Board staff appreciate the opportunity to work with you through this process and toward the protection of water quality. Feel free to contact me at (707) 576-2687 or [cgoodwin@waterboards.ca.gov](mailto:cgoodwin@waterboards.ca.gov) any time to discuss issues or concerns related to the Ukiah wastewater treatment facility.

Sincerely,

Cathleen A. Goodwin  
Water Resource Control Engineer

Enclosure: Draft Permit

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